

January 25, 2001



INTERNATIONAL  
PREPAID  
COMMUNICATIONS  
ASSOCIATION

Formerly  
the International  
Telecard  
Association

Mr. David Waddell  
Tennessee Regulatory Authority  
460 James Robertson Pkwy.  
Nashville, TN 37243-0505

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RE: In the Matter of Notice of Rulemaking Amendment of Regulations For Telephone  
Service Providers. Docket No. 00-00875

EXECUTIVE SECRETARY

OFFICE OF THE

EXECUTIVE SECRETARY

Dear Mr. Waddell:

The International Prepaid Communications Association wishes to associate itself with the "Industry Members" Consensus Suggested Revisions to Those Provisions of the Proposed Rules That Will Be Addressed During Workshop I" with particular regard to footnote 2 on page 9 regarding prepaid phonecards.

The IPCA is the national trade association for the prepaid communications industry -- we were formerly the International Telecard association -- and many of the signatories of the Consensus statement are members of our organization.

We would be glad to work with you and the TRA staff to set up or participate in an informal or formal workshop/briefing session on prepaid phonecards. Some issues we would be prepared to discuss are the following:

- Basic mechanics of the phonecard industry
- Current marketing practices, and varieties of phonecards
- Possible disclosure requirements
- Current major issues of consumer concern
- How the Commission might help educate consumers to be wise users of phonecards.
- What other states have done
- Enforcement issues -- how the Commission might enforce rules once adopted

Often when I work with regulatory agencies, I find that often the Commissioners and the staff meet with lobbyists based in the state capital that have to work on a panoply of telecom issues. One thing I would endeavor to do is to bring into the workshop persons who are involved in the distribution of phonecards and who see consumer issues on a first hand basis, and persons who are administering phonecard programs and work in the regulatory environment.

Thank you for your consideration of this request. I would also ask that I be notified when any other activity by the Commission is scheduled on this docket. My email is [howard@I-PCA.org](mailto:howard@I-PCA.org).

If I can answer any questions by phone, I would be glad to do so.

Sincerely,

POSTED  
1/30/01

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